

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
MONTGOMERY DIVISION**

**JEROME W. GRIFFIN, for  
himself and all others similarly  
situated,**

**Plaintiff,**

**V.**

**ALABAMA GAS  
CORPORATION,**

**Defendant.**

**CIVIL ACTION NO.  
2:06-cv-365-MEF**

**MOTION TO EXTEND THE DEADLINE**  
**FOR DISPOSITIVE MOTIONS**

Defendant Alabama Gas Corporation (“Alabama Gas”) moves this Court to extend the deadline for dispositive motions to August 24, 2007. In support of this Motion, Alabama Gas says as follows:

1. The current deadline for dispositive motions is July 3, 2007, the deadline for a face-to-face settlement conference is July 24, 2007, and the deadline for discovery is September 17, 2007.

2. The parties have had some discussions about settlement and although the discussions are preliminary, Alabama Gas believes that the likelihood of settlement may increase if the parties can avoid the expense of discovery and dispositive motions. In that regard, Alabama Gas believes that settlement may be aided if the deadline for dispositive motions is moved to after the face-to-face settlement conference.

3. An extension to August 24, 2007, will allow the parties sufficient time to conduct additional discovery, if any, and to file dispositive motions if the face-to-face settlement conference fails to resolve this matter.

4. This extension should not impact the Court's trial docket since Alabama Gas is not requesting an extension of the discovery deadline. Alabama Gas believes that even with the extension to August 24, 2007, the Court can still hold the pretrial conference on October 1, 2007 and keep this case on the November 5, 2007 trial docket.

5. Counsel for plaintiff, Andrew Allen, does not oppose this Motion.

WHEREFORE, Alabama Gas respectfully requests that the Court extend the deadline for dispositive motions to August 24, 2007, to give the parties sufficient time to conduct any additional discovery if the case is not resolved and to give Alabama Gas sufficient time to file a dispositive motion, if necessary.

s/Abdul K. Kallon  
One of the Attorneys for  
Alabama Gas Corporation  
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CERTIFICATE OF SERVICE

I hereby certify that on June \_\_\_, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Joe R. Whatley, Jr.  
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and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

None.

Respectfully submitted,  
s/ Abdul K. Kallon  
\_\_\_\_\_  
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